

**LONDON BOROUGH OF HAMMERSMITH & FULHAM
LOCAL PLAN EXAMINATION**

WRITTEN STATEMENT

ISSUE 8: INFRASTRUCTURE, MONITORING AND OTHER MATTERS

Does the Plan address adequately the provision of necessary infrastructure to support the delivery of the strategic objectives and the vision? Are the Plan's monitoring targets justified adequately and of a level of detail that is appropriate to a Local Plan? How will the effectiveness of the Plan be managed?

Date: 22 May 2017

1. With due regard to all infrastructure (transport, resources, services etc) is the Infrastructure Delivery Plan up to date? Does it specify clearly what is required, where, when and how it may be funded and delivered?

The Infrastructure Delivery Plan (IDP) is up to date, providing a clear picture of infrastructure needs and requirements across varying sectors in relation to achieving the vision of the Plan.

The Infrastructure Delivery Plan includes an infrastructure schedule which sets out the key pieces of infrastructure that will be required, including who the responsible parties are for their delivery, their indicative costs and funding sources (as far as we are able), and when we expect to be able to bring the infrastructure forward. The IDP has been informed by the Local Plan preparation and as part of adopting the Council's Community Infrastructure Levy (CIL) (SD46).

This schedule is considered to be a 'live' document and has been/will be updated regularly to help inform and justify the Council's CIL schedule (SD46) and a planned future revision to this levy.

The Infrastructure Schedule considers a number of variables related to specific infrastructure schemes which could be subject to uncertainty and change. These variables will be monitored through the Schedule itself and through the Annual Monitoring Report to ensure uncertainty is managed and flexibility can be accommodated in the delivery of infrastructure.

2. How have risks and contingency been robustly addressed in the production of the Plan? Where is the supporting evidence?

The Council's approach towards ensuring that the strategy of the Plan is delivered, what the risks to it are and how they will be minimised is considered to be robust and is supported by evidence.

The Council has identified the challenges and risks facing the borough in Sections 2 and 4 of the Local Plan and outlined contingencies in section 4 and 6, such as working with stakeholders and strategic partners, using the development management process and compulsory purchase powers, preparing planning frameworks for specific areas, considering viability, managing funding sources and infrastructure projects and applying monitoring and review mechanisms.

The council considers that the Local Plan strikes a sound balance between setting a clear strategic direction for development on the one hand, and allowing flexibility for unforeseen circumstances on the other. The Local Plan allows flexibility in a number of areas, including:

- Strategic Policy – Regeneration Areas- provides housing and job numbers for the Opportunity/Regeneration Areas as indicative to allow flexibility in delivery.
- For the purpose of infrastructure planning, the Council has considered the extent to which the indicative housing targets included in Policy

H01 could be exceeded. The upper figures do not represent a target but indicate the range within which the actual total might lie.

- The delivery of borough-wide housing numbers will be monitored, through the Annual Monitoring Report (AMR) (SD8 and EX7) including a Housing Trajectory (SD14) which considers a flexible managed delivery target.
- All the Borough Wide Strategic Policies allow for a degree of flexibility and discretion in their application to individual planning application proposals. An example of this is Policy H03 on Affordable Housing which allows for negotiation, but sets out clear and robust criteria which the council will take into account. This is based on a Housing Viability Assessment (SD15) which considers a range of potential scenarios based on housing grant and other possible market and policy circumstances. A further example is Policy E1 which allows for flexibility in the retention of employment premises under prescribed circumstances.

The supporting evidence for the council's approach to risk and contingency has been derived from a number of documents and studies, including the council's Infrastructure Delivery Plan (SD45), the Housing Trajectory (SD14), the London SHLAA (SD70), the council's Affordable Housing Viability Study (SD15) and Area SPDs(SD54, SD55 and SD56) and the Area DIFS (SD60 and SD61).

The Local Plan's Infrastructure Delivery Plan (SD45) sets out the main actions needed to achieve the Local Plan's aims and objectives. It assesses the most important of the relationships between the policies and proposals, examining who does what, recognising the key role of the Council as planning authority as well as an implementation agency in its own right. This will involve strong working and robust actions with the Council's full range of partners to deliver the levels of growth envisaged.

Deliverability of the Plan is demonstrated in the Strategic Housing Land Availability Assessment (SHLAA) (SD70) , the Housing Trajectory and the 5 year housing supply which are in line with the NPPF and specifically consider the deliverability of sites over the plan period. These documents have been undertaken in accordance with the NPPF and involved consultation with relevant stakeholders to ensure anticipated timing of delivery is accurate.

The plan includes a wide range of sites which are projected to provide a significant number of homes per year in line with the London Plan target. This is evidenced by the council's housing trajectory (SD14). The council consider that this is not a plan which rests on the delivery of a particular site or scheme and such a position helps minimise the potential need for an early review of the Plan. Further detail on deliverability and review is contained with the council's response to the inspector's procedural letter 2 (EX3).

To further ensure accuracy of delivery, the council's statements for issue 2 'Regeneration Areas' demonstrates the deliverability of growth and change within the Regeneration Areas of White City, Fulham, South Fulham Riverside and Hammersmith Town Centre respectively.

3. How will the effectiveness of the Plan and its individual policies be measured/assessed? Should there be monitoring indicators for each policy/objective? Is Appendix 6 sufficiently related to the policy content and objectives?

Are the arrangements for managing and monitoring the delivery of the Plan clear and will they be effective?

Should the Plan include clearer timescales to assist monitoring, thereby providing milestones to assess policy effectiveness?

The effectiveness of individual policies will be monitored in the AMR by way of indicators which are outlined in appendix 6 of the Local Plan (KD1). The monitoring indicators are specifically related to the policy content and objectives of the Local plan and are considered to be Specific, Measurable, Achievable, Realistic and Time Bound (SMART) and complement current National Indicators (NIs), Core Output Indicators (COIs), London Plan Key Performance Indicators (KPIs) and Local Plan Sustainability Appraisal (SA) indicators. Ideally, each policy/objective should have an indicator, but this is not always practical because the feasibility of using certain indicators can be constrained by the availability of data and financial and human resources. The council have prepared indicators that fit with the availability of data and within the resources available to the council.

The arrangements for monitoring the delivery of the plan are clear and will be effective. Section 4 of the Local Plan (KD1) commits the council to prepare "annual monitoring reports to review the effectiveness of policies and identifying alterations where necessary". Therefore if necessary the council will prepare replacement policies and adopt these accordingly. The council consider that monitoring all policies on an annual basis is clear and appropriate and is an establish time period for assessing policy effectiveness.

4. Do the changes to the policies map reflect the Plan adequately? Are the changes proposed to the Policies Map sufficiently clear and comprehensive?

Is the Policies Map informed by the evidence adequately?

Should the MoL boundary remain extant, eg at Fulham Palace?

Is the policies map accurate and clear with regard to OAPRDC and overground stations?

Changes to the 2011 Proposals map (SD5) as shown in the Proposals Map changes document (KD2) are considered to adequately reflect the plan and are sufficiently clear and comprehensive. The proposals map changes document (KD2) provides a schedule of all map changes including a description of the change and whether it is an amendment, addition or deletion to the map. The schedule in KD2 is supported by associated A4 maps which clearly indicate the change proposed.

All the changes to the proposals map are adequately supported by evidence. For example changes to open space boundaries on the proposals map have been informed by the Open Spaces Background paper (SD24) and the changes to the retail designations are supported by the Retail background paper (SD20).

The council consider that the MOL boundary at Fulham Palace should remain as designated. The parcel of land in question is considered to have the requisite attributes to continue to be designated as MOL and there is no evidence to the contrary to support a change in this location. In particular the council consider the land contains features or landscape of historic, recreational, nature conservation or habitat interest.

The OPDC requested that Map 4, the 'Key diagram' of (KD1) should include overground stations at Old Oak Common Lane and Hythe Road. Minor change MC20 in the minor changes schedule (KD4) proposes to make the change requested. Such a change is not considered necessary for the proposals map.

All the proposed changes to the proposals map are included in KD2 except for one, which is the recent London Heliport safeguarding by the Civil Aviation Authority. This change has been included in the minor changes schedule, but because of the timing of this safeguarding, a map was not included in the proposals map changes document (KD2) at submission. A map showing the extent of the heliport safeguarding can be issued to the Inspector prior to the hearing and will need to be included as a change to the 2011 proposals map (SD5).

5. Is the approach of the Plan towards S106 obligations consistent with national policy? Is the reference to 'monitoring expenses' justified?

The council considers that the approach of the Plan is consistent with national policy. Planning conditions and obligations are covered in paragraphs 203 – 206 of the NPPF. In particular the NPPF states that Planning Obligations should only be sought if they are necessary to make the development acceptable, are directly related, and related in scale and kind to the development. The council have made specific reference to the need to meet these 'tests' in Policy INFRA1 of the Local Plan (KD1).

With regard to the reference to 'monitoring expenses', the council are mindful of recent high court judgements about S106 monitoring fees and whether these meet the 'necessity test' in the NPPF. The council would welcome discussion on this matter as there are examples of where monitoring expenses are necessary and relevant to large schemes in the borough, where for example, the council has incurred costs for air quality monitoring related to the development. The council would be happy to consider a revision where necessary to the wording regarding monitoring fees following discussion at the hearings.